

THE CITY OF NEW YORK  
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June 15, 2022

**BY ECF**

Honorable Vera M. Scanlon  
United States Magistrate Judge  
Eastern District of New York  
225 Cadman Plaza East, 1214 South  
Brooklyn, New York 11201

Re: Angie Velez et al. v. Artem Prusayev, et al.,  
22-CV-1810 (FB) (VMS)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and the attorney assigned to represent defendant City of New York ("City") in the above-referenced matter. Defendant City writes pursuant to the Court's June 9, 2022 Order, directing defendant City to advise the Court as to the progress of the Civilian Complaint Review Board ("CCRB") investigation pertaining to Artem Prusayev. (See Electronic Order dated 6/09/2022.) For reasons set forth herein, defendant City respectfully requests until June 21, 2022 to provide the City's full position on its stay request and position regarding representation of the individual defendant. Plaintiffs consent to this request.


By way of background, on June 9, 2022 the Court directed the City to provide a status report by June 15, 2022 regarding representation of Artem Prusayev and the pending administrative prosecution. While the City has maintained communication with the CCRB, the City has not yet received full and complete answers regarding the information the Court outlined in its June 9, 2022 Order, such as, for example, an updated estimate of the anticipated timeline for the administrative prosecution's completion. Providing this Office until June 21, 2022 should be sufficient time for the City to obtain this additional information regarding the administrative prosecution and provide the Court with a timeline for resolution of any representation issues.

Because of this, defendant City respectfully requests until June 21, 2022, to ascertain its position on the need for a stay during the pendency of the administrative prosecution

and regarding the representation of Officer Prusayev. Defendant also requests a corresponding extension, on plaintiff's behalf, for them to file their response in opposition, if any.

The City thanks the Court for its consideration of this request.

Respectfully submitted,

By: /s/   
Michael Pesin-Virovets  
*Senior Counsel*

cc: **BY ECF**

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